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Attorneys for Defendants
Woodbine Alaska Fish Company,
and Guy Ferrari Inc.

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA

CITICAPITAL COMMERCIAL CORP,)
Plaintiff,)

v.)

EGEGIK SPIRIT, official number 2999957,)
her equipment, gear, furniture, apparel,)
fixtures, tackle, boats, machinery, anchors)
and all appurtenances, in rem;)
NAKNEK SPIRIT, official number 585824,)
her equipment, gear, furniture, apparel,)
fixtures, tackle, boats, machinery, anchors)
and all appurtenances, in rem;)
WOODBINE ALASKA FISH CO.,)
in personam; and GUY FERRARI, INC,)
in personam.)

Defendants,)

Case No. A-04-0147 CI
IN ADMIRALTY

MEMORANDUM IN SUPPORT
OF PROPOSED DISCOVERY
PLAN

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MEMORANDUM IN SUPPORT OF PROPOSED DISCOVERY PLAN

On March 28, 2006, this Court ordered that the parties meet and confer and submit a proposed discovery plan by May 8, 2006. On April 11, 2006 counsel for Defendants sent a proposed discovery plan to counsel for Plaintiff by facsimile and first class U.S. mail. A follow up letter was sent on April 13, 2006. To date counsel for Plaintiff has not responded. Pursuant to this Court's order to submit a discovery plan, Defendants hereby submit the attached proposed order.

Dated: 8 May 2006

BIRNBERG & ASSOCIATES

By: s/Cory Birnberg

Cory A. Birnberg

BIRNBERG & ASSOCIATES

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MEMORANDUM IN SUPPORT OF PROPOSED DISCOVERY PLAN